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ATTORNEYS FOR THE FROST
NATIONAL BANK

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	CASE NO. 10-40052
VAN HUNTER DEVELOPMENT, LTD	§	
	§	
DEBTOR	§	

**THE FROST NATIONAL BANK'S RESPONSE TO THE
UNITED STATES TRUSTEE'S MOTION TO DISMISS OR CONVERT,
OR IN THE ALTERNATIVE, FOR OTHER RELIEF**

The Frost National Bank ("Frost") files its Response to United States Trustee's Motion to Dismiss or Convert, or in the Alternative, for Other Relief, as follows:

1. Upon belief, Frost is one of two primary secured lenders in this bankruptcy case. Frost does not dispute the Trustee's statements in the Trustee's Motion or the Trustee's general basis for seeking such relief and movement in this case.

2. In order to allow the Debtor, Frost, and other parties a final opportunity to evaluate Plan and settlement prospects, Frost requests the Court to order the alternative relief requested by the Trustee (confirmation or case resolution deadlines) prior to ordering dismissal or conversion.

WHEREFORE, PREMISES CONSIDERED, Frost requests the Court to enter appropriate confirmation or case resolution deadlines as requested by the Trustee, to decline conversion or

dismissal at this time, and to enter such further orders grating Frost such other and further relief, general or special, at law or in equity, to which it may be rightfully entitled.

Respectfully submitted,

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By: /s/ Hudson M. Jobe
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ATTORNEYS FOR THE FROST NATIONAL BANK

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served by electronic transmission via the CM/ECF system upon all parties registered to receive electronic notice in this bankruptcy case, and/or regular U.S. mail, postage prepaid, on this 20th day of January, 2011, on the parties listed on the attached service list.

/s/ Hudson M. Jobe